

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

JANE DOE 1 and JANE DOE 2,

Plaintiffs,

v.

SAAD EL-DIN RAFIK AL-HARIRI,  
BAHAA HARIRI, AYMAN HARIRI,  
MOHAMMED HARIRI, ALI H.  
KOLAGHASSI, and HELEN CONLON,

Defendants.

Case No. 1:23-cv-02145

**NOTICE OF MOTION TO DISMISS AMENDED COMPLAINT FOR LACK OF  
SUBJECT MATTER JURISDICTION, LACK OF PERSONAL JURISDICTION, AND  
FAILURE TO STATE A CLAIM UPON WHICH RELIEF CAN BE GRANTED**

**TO: ALL COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that on Thursday, October 5, 2023, the undersigned counsel will move before the Honorable Carol Bagley Amon, U.S.D.J., United States District Court for the Eastern District of New York, 225 Cadman Plaza East Brooklyn, New York 11201, Courtroom 10D South, pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(b)(2), and 12(b)(6), for an order dismissing Plaintiffs' Amended Complaint.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, the undersigned rely on Defendants' Memorandum in Support of Motion to Dismiss Amended Complaint for Lack of Subject Matter Jurisdiction, Lack of Personal Jurisdiction, and Failure to State a Claim upon Which Relief Can Be Granted, as well as the authorities attached to and referenced in that Memorandum.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Court's October 3, 2023 Order, oral argument will be held on December 14, 2023, at 2:00 p.m.

Dated: October 5, 2023

Respectfully submitted,

/s/ Rita M. Glavin

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